

ORIGINAL

Approved by: Kristen Dorfman
KRISTEN DORFMAN
Special Assistant United States Attorney

Before: THE HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York

22 MJ 2744

- - - - -X
UNITED STATES OF AMERICA : MISDEMEANOR
 : COMPLAINT
 :
-v- : Violation of
 :
ROBERT STAAB : NYVTL 511(1)(a)
 : NYVTL 1180(c)(2)
 :
Defendant : COUNTY OF OFFENSE:
 : ORANGE
- - - - -X
SOUTHERN DISTRICT OF NEW YORK, ss.:

BRYAN KNAUFF, being duly sworn, deposes and says that she is a Court Liaison assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, and charges as follows:

COUNT ONE

On or about December 9, 2021, at the United States Military Academy, West Point, New York, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, ROBERT STAAB, the defendant, unlawfully, knowingly and willfully operated a motor vehicle upon a public road while knowing, or having reason to know, that his license to operate such motor vehicle in New York was suspended, revoked, or otherwise withdrawn by the commissioner, to wit, the defendant was observed operating his motor vehicle on Washington Road and an investigation revealed that the defendant's state driver's license had been suspended.

(New York Vehicle and Traffic Law, Section 511(1)(a))

COUNT TWO

On or about December 9, 2021, at the United States Military Academy, West Point, New York, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, ROBERT STAAB, the


defendant, unlawfully, knowingly and willfully operated a motor vehicle in an established school zone with flashing beacons to wit, the defendant was observed driving at a speed of 25 mph in a 15 mph school zone.

(New York Vehicle and Traffic Law, Section 1180(c)(2))

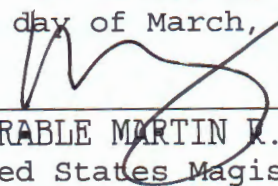
The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

1. I am Court Liaison, assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, which is located in the Southern District of New York.
2. On or about December 9, 2021, at approximately 7:30 a.m., MP Officer, CPL Tyler O'Quinn, School Resource Officer, was conducting traffic enforcement on Washington Road within the school zone. CPL O'Quinn observed a 2016 white in color Ford Escape driving east bound on Washington Road at a high rate of speed. The vehicle was being operated by the defendant. A speed sign board located on a light pole along Washington Road adjacent to Building 500, calculated the vehicle's speed at 25 MPH. The speed limit in the school zone is 15 MPH. CPL O'Quinn initiated a traffic stop. When he ran the defendant's license, it came back suspended for other traffic violations.
3. The defendant was issued a District Court Violation Notice for operating a motor vehicle while license suspended or revoked (DCVN number E1319708/SY10), a District Court Violation Notice for Speeding in a School Zone (DCVN E1319709/SY10) and was released on his own recognizance.

WHEREFORE, deponent prays that the above defendant be imprisoned or bailed, as the case may be.


BRYAN KNAUFF
Court Liaison

Sworn to before me this
24th day of March, 2022


HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York